

# EXHIBIT 16

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**UNITED STATES DISTRICT COURT  
IN AND FOR THE DISTRICT OF WYOMING**

STEPHANIE WADSWORTH, Individually  
and as Parent and Legal Guardian of W.W.,  
K.W., G.W., and L.W., minor children, and  
MATTHEW WADSWORTH,

Plaintiffs,

v.

WALMART, INC. and JETSON  
ELECTRIC BIKES, LLC,

Defendants.

Case No.: 2:23-cv-00118-NDF

JURY TRIAL DEMANDED

### **PLAINTIFFS' INITIAL EXPERT WITNESS DISCLOSURES**

Pursuant to this Court's Order Setting Case for Jury Trial for January 27, 2025, and in accordance with Fed. R. Civ. P. 26(a)(2) and U.S.D.C.L.R. 26.1(e), Plaintiffs, Stephanie Wadsworth, Individually and as Parent and Legal Guardian of W.W., K.W., G.W., and L.W., minor children, and Matthew Wadsworth, by and through the undersigned counsel, hereby file their initial disclosures of expert witnesses. Pursuant to the Court's Order, Plaintiffs designate their expert witnesses, including a comprehensive statement of expert's opinions and the basis for the opinions in Exhibit A and Exhibit B.

Plaintiffs reserve the right to supplement, update or make substitutions to this list as the need may arise or as additional witnesses are identified in ongoing investigation and discovery.

1. RONALD E. SNYDER, MD  
668 N. Orange Ave., Ste 1018  
Maitland, FL 32751  
Tel: (407) 598-5055  
**Expertise: Pediatric and Adult Psychiatrist – Life Care Planner**

Dr. Snyder currently serves as the Medical Director and Founder of Psychiatry Life Care Planning Associates in Maitland, FL. Dr. Snyder graduated from the Indiana University Medical School in 1972. Dr. Snyder is licensed to practice medicine in the State of Florida. As a practicing psychiatrist, Dr. Snyder has been preparing adult and pediatric Life Care Plans for 15 years, and he is knowledgeable and experienced in preparing such a life care plan in this case.

Dr. Snyder has prepared a Life Care Plan for Stephanie Wadsworth and is expected to testify as to her injuries and her future care needs as a result of the incident that serves as the basis for this lawsuit. Dr. Snyder relies upon his education, training, background and experience, as well as his review of relevant medical records, case materials, conversations with treating providers, and his assessment/examination of Stephanie Wadsworth as the basis for his opinions.

Dr. Snyder's Curriculum Vitae along with his expert opinion are attached as Exhibit A.

2. MICHAEL J. SCHULZ, M.S.

915 Highland Pointe Drive, Ste. 250

Roseville, CA 95678

Tel: (630) 258-9472

**Expertise: Fire Safety, Security and Emergency Management – Forensic Investigator.**

Mr. Michael J. Schulz is the President and Principal Consultant at MJ. Schulz & Associates, Inc., specializing in safety, security, and emergency management, with expertise in investigating hostile fire and explosion incidents. With over 42 years of experience, he has served as a civil defense officer, law enforcement officer, fire department command officer, private consultant, and college professor.

Mr. Schulz holds a Master of Science (M.S.) in Safety, Security, and Emergency Management from Eastern Kentucky University and a Bachelor of Science (B.S.) in Fire and Safety Engineering Technology from the University of Cincinnati. Mr. Schulz maintains proficiency as required by National Fire Code NFPA 1033, focusing on fire science, fire dynamics, explosion dynamics, and investigation technology.

Mr. Schulz is expected to testify that the fire at the Wadsworth residence originated inside the residence and was caused by the Jetson Hoverboard in question. Mr. Schulz has outlined his opinions in the accompanying set of opinions/report. Mr. Schulz relies upon his education, training, background and experience, as well as his review of relevant case materials, including but not limited to photographs, videos, deposition transcripts, his inspection of the residence, police and investigation reports, relevant research and literature, etc., as the basis for his opinions. Mr. Schulz's Curriculum Vitae along with his expert's opinion are attached as Exhibit B.

3. DEREK A. KING, M.S., P.E  
915 Highland Pointe Drive, Ste. 250  
Roseville, CA 95678  
Tel: (510) 549-3300  
**Expertise: Mechanical and Electrical Engineer**

Mr. King holds a Master of Science (M.S) in Electrical Engineering from Ohio University and a Bachelor of Science (B.S) in Mechanical Engineering from U.C Berkeley. Mr. King is registered as a professional engineer in the State of California, and is currently employed at Berkeley Engineering and Research, Inc (BEAR). Mr. King has experience identifying the root cause of failures and creating innovative and targeted solutions. His skills include ISO & Safety Compliance, design and fabrication, and technical justification for design decisions and expert opinions.

Mr. King is expected to testify that the fire at the Wadsworth residence originated and was caused by the Jetson Hoverboard in question, specifically the battery pack. Mr. King will further testify as to the Subject Hoverboard's deficient warnings. Mr. King has outlined his opinions in the accompanying set of opinions/report. Mr. King relies upon his education, training, background and experience, as well as his review of relevant case materials, including but not limited to photographs, videos, deposition transcripts, his inspection of the hoverboard, police and investigation reports, relevant research and literature, etc., as the basis for his opinions. Mr. King's Curriculum Vitae along with his expert's opinion are attached as Exhibit C.

4. Non-retained Medical Experts expected to testify as to Plaintiffs' injuries:
  - a. Dr. Scott Sulentich of Rock Springs Plastic Surgery Center.
  - b. Kris Sherwin, PA-C of Rock Springs Plastic Surgery Center
  - c. Dr. Giovanni Lewis of University of Utah

- d. Dr. Michael Nelson of High Plains PT
- e. Mindy Tollefson, Clinical Social Work/Therapist, MSW, LCSW
- f. Dr. Joel Robertson of Castle Rock Medical Center
- g. Treeters at Memorial Hospital of Sweetwater County
- h. Treeters at Advanced Medical Imaging
- i. Treeters at Castle Rock Medical Center
- j. Treeters at University of Utah- UH Hospitals and Clinics
- k. Treeters at University of Utah – Intermountain Burn Center
- l. Treeters at High Plains Physical Therapy
- m. Treeters at Desert View Eye Care
- n. Treeters at Rock Springs Plastic Surgery and Dermatology Center
- o. Any and all other health care providers or health professionals who rendered care to Plaintiffs relating to the underlying incident.

Date: July 15, 2024

Respectfully Submitted,

/s/ Rudwin Ayala

**RUDWIN AYALA, Esq.\***

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*Admitted Pro Hac Vice*

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on July 15, 2024, a true and correct copy of the foregoing was electronically served to all counsel of record.

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/s/ Rudwin Ayala

**RUDWIN AYALA, Esq.**